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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GOLDEN BOY PROMOTIONS, LLC, a
Delaware limited liability company,

Plaintiff,

vs.

RYAN GARCIA, an individual, GUADALUPE
VALENCIA, an individual, and DOES 1
through 25, inclusive,

Defendants.

CASE NO. 2:23-cv-00942-APG-VCF

**DECLARATION OF JAMES M.
PEARL IN SUPPORT OF
DEFENDANT RYAN GARCIA'S
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

Judge: The Hon. Andrew P. Gordon
Date Action Filed: June 16, 2023

1 I, James M. Pearl, declare as follows:

2 1. I am an attorney admitted to practice law before all Courts in the State of California
3 and before this Court, *pro hac vice*. I am a partner at the law firm of Paul Hastings LLP, counsel
4 of record for Defendant Ryan Garcia in the above-captioned matter. I have personal knowledge of
5 the matters discussed below and if called upon to do so, I could and would testify to these facts.

6 2. I make this Declaration in Support of Defendant Ryan Garcia's Motion to Dismiss
7 Plaintiff's Complaint.

8 3. Attached hereto as **Exhibit A** is a true and correct copy of the agreement between
9 Golden Boy Promotions, LLC and Ryan Garcia ("Agreement") regarding the grant of Ryan
10 Garcia's exclusive promotional rights to Golden Boy Promotions, LLC dated September 18, 2019.

11 4. Attached hereto as **Exhibit B** is a true and correct copy of the agreement between
12 Golden Boy Promotions, LLC and Ryan Garcia regarding the grant of Ryan Garcia's exclusive
13 promotional rights to Golden Boy Promotions, LLC, dated November 1, 2016.

14 5. Attached hereto as **Exhibit C** is a true and correct copy of the letter from James "Bo"
15 Pearl, counsel for Defendant Ryan Garcia, to Golden Boy Promotions, LLC regarding the Notice
16 of Breaches of Agreement by Golden Boy Promotions, LLC, dated June 9, 2023.

17
18
19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct.

21
22 Executed this 21st day of August, 2023 at Century City, California.

23
24 /s/ James M. Pearl
25 JAMES M. PEARL